Stakeholder Comment Matrix – October 26, 2020

Draft Proposed Amended Section 505.2 of the ISO Rules, *Performance Criteria for Refund of Generating Unit Owner's Contribution* ("Section 505.2") – Option 1 Draft Rule Language

Period of Comment:	October 26, 2020	through	November 9, 2020	**Contact:**	Grant Pellegrin
Comments From:	Cenovus Energy			**Phone:**	403-766-3955
Date [yyyy/mm/dd]:	2020/11/09			**Email**:	Grant.pellegrin@cenovus.com

Instructions:

1. **Please fill out the section above as indicated.**
2. **Please refer back to the *Letter of Notice for Feedback on the Content of Proposed Options for Amended Section 505.2* under the "Related Materials" section to view the actual draft proposed materials on amended Section 505.2.**
3. **On the sections of the rule listed below, please provide your specific comments, proposed revisions, and reasons for your position underneath (if any). Blank boxes will be interpreted as favourable comments.**
4. **Please be advised that general comments do not give the AESO any specific issue to consider and address, and results in a general response.**

Question	Stakeholder Comments
Refund of Generating Unit Owner's Contribution	
2 The **ISO** must calculate a refund for each calendar year during the refund period as: $$\text{refund} = \text{annual amount} \times \text{availability assessment}$$ where: (a) annual amount is as specified in the **ISO tariff**; and (b) availability assessment is calculated in accordance with subsection 3, 4, or 5, as applicable.	No comments

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<table>
<tr><th>Question</th><th>Stakeholder Comments</th></tr>
<tr><td>Availability Assessment for Generation With Energy Market Offers</td><td></td></tr>
<tr><td>3 Subject to subsections 4 and 5, the ISO must calculate the availability assessment for a generating unit or an aggregated generating facility that submits offers for energy as follows:
(a) identify cumulative time-weighted hourly availability using the available capability of the generating unit or aggregated generating facility in relation to its critical maximum capability;
(b) calculate the average hourly availability by dividing the value determined in subsection 3(a) by the number of hours in the year; and
(c) determine the availability assessment for the generating unit or aggregated generating facility based on the average hourly availability as follows:
<table>
<tr><th>Average Hourly Availability [subsection 3(c)]</th><th>Availability Assessment</th></tr>
<tr><td>Less than 0.60</td><td>0%</td></tr>
<tr><td>0.60 to 0.80</td><td>$\frac{\text{average hourly availability} - 0.60}{0.20} \times 100\%$</td></tr>
<tr><td>Greater than 0.80</td><td>100%</td></tr>
</table>
</td><td>The proposed changes to the GUOC formula are an improvement over the current rule. The proposed revision appears acceptable.</td></tr>
<tr><td>Availability Assessment for Renewable Generation and Generation with a Maximum Capability Less than 5 MW</td><td></td></tr>
<tr><td>4 The ISO must calculate the availability assessment for a wind, solar, or run of river hydroelectric generating unit or an aggregated generating facility, an aggregated asset containing a wind, solar or run of river generating unit or aggregated generating facility, and a generating unit or aggregated generating facility with a maximum capability less than 5 MW, as follows:</td><td>No Comments</td></tr>
</table>

Question	Stakeholder Comments
(a) identify the cumulative time-weighted hourly availability using the metered energy of the **generating unit** or **aggregated generating facility**, less any volumes dispatched for **operating reserve,** in relation to its critical **maximum capability**; (b) calculate average hourly availability by dividing the value determined in subsection 4(a) by the number of hours in the year; and (c) subject to subsection 4(d), determine the availability assessment for the **generating unit** or **aggregated generating facility** based on the average hourly availability as follows:	

Average Hourly Availability [subsection 4(c)]	Availability Assessment
Less than 0.15	0%
0.15 to 0.25	$\frac{\text{average hourly availability} - 0.15}{0.10} \times 100\%$
Greater than 0.25	100%

(d) determine the availability assessment for a solar **aggregated generating facility** based on the average hourly availability as follows:

Average Hourly Availability [subsection 4(c)]	Availability Assessment
Less than 0.08	0%
0.08 to 0.12	$\frac{\text{average hourly availability} - 0.08}{0.04} \times 100\%$
Greater than 0.12	100%

Question	Stakeholder Comments
Availability Assessment for Behind the Fence Generation with Net Offers	
5 The **ISO** must calculate the availability assessment for a site with 1 or more onsite **generating units** or **aggregated generating facilities** that supplies electric energy for 1 or more onsite load assets and offers excess generation to the energy market on a net basis as follows: (a) identify the cumulative time-weighted hourly availability using the **available capability** of the site in relation to the site's Rate STS **contract capacity**; (b) calculate average hourly availability by dividing the value determined in subsection 6(a) by the number of hours in the year; and (c) determine the availability assessment for the site based on the average hourly availability as follows:	
Adjustments	
6 The **ISO** may make adjustments to the hourly availability if the **generating unit** or **aggregated generating facility** is affected by an event outside the control of the **owner** of a **generating unit** or **aggregated generating facility**, including but not limited to a transmission or distribution facility outage, congestion, a **directive** issued by the **ISO** or a circumstance arising under the **ISO tariff** or an **ISO rule**.	This appears acceptable

Average Hourly Availability [subsection 5(c)]	Availability Assessment
Less than 0.60	0%
0.60 to 0.80	$\frac{\text{average hourly availability} - 0.60}{0.20} \times 100\%$
Greater than 0.80	100%

Question	Stakeholder Comments
Communication	
7 The **ISO** must provide a preliminary performance assessment, along with all related input data, to the **legal owner** of a **generating unit** or an **aggregated generating facility** by January 31 of the year following the calendar year to which the refund relates.	This appears acceptable